

UNITED STATES DISTRICT COURT
DISTRICT OF NEBRASKA

MARIA GUZMAN MORALES and) Case No. 8:08CV504
MAURICIO GUARJARDO, on behalf)
of themselves and all other similarly)
situated,)
Plaintiffs,) NOTICE OF WITHDRAWAL OF
vs.) CONSENT TO JOIN COLLECTIVE
FARMLAND FOODS, INC., a) ACTION
Delaware Corporation and subsidiary of)
Smithfield Foods,)
Defendant.)

)

NOTICE

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

The following individual has indicated in writing to counsel for Plaintiff that he wishes to withdraw his consent to join this collective action:

1. CAI HUYNH

Attached as Exhibit A to this Notice is the Declaration of Carolyn H. Cottrell, attached to which is a true and correct copy of the Declaration of the Opt-In Plaintiff who wishes to withdraw his consent to join this collective action.

April 6, 2011

Respectfully submitted,

/s/ Carolyn H. Cottrell
CAROLYN H. COTTRELL
Attorneys for Plaintiffs and the Class

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Attorneys for Plaintiffs and the Class

EXHIBIT A

UNITED STATES DISTRICT COURT
DISTRICT OF NEBRASKA

MARIA GUZMAN MORALES and)	Case No. 8:08CV504
MAURICIO GUARJARDO, on behalf)	
of themselves and all other similarly)	
situated,)	DECLARATION OF CAROLYN H.
)	COTTRELL REGARDING THE
Plaintiffs,)	TRANSLATION OF OPT-IN
)	PLAINTIFF'S DECLARATION
vs.)	
)	
FARMLAND FOODS, INC., a)	
Delaware Corporation and subsidiary of)	
Smithfield Foods,)	
Defendant.)	
)	

I, Carolyn H. Cottrell, declare as follows:

1. I am a partner in the law firm of Schneider Wallace Cottrell Brayton Knoecky LLP, attorneys of record in the instant action. I am an attorney duly licensed to practice law in the State of California, and I am a member in good standing of the State Bar of California. I am admitted to the United States District Courts for the Northern Eastern, Central and Southern Districts of California, and I am a member of the Bar of the United States Supreme Court.
2. Attached as Exhibit A is a true and correct copy of Cai Huynh's Declaration to withdraw his consent to join this collective action.
3. Attached as Exhibit B to this Declaration is a true and correct copy of Cai Huynh's Declaration, which served as the document that was translated into Vietnamese by a professional translation service.

I declare under penalty of perjury under the laws of the United States that the

foregoing is true and correct. Executed on 5th day of April, 2011.

April 6, 2011

Respectfully submitted,

/s/ Carolyn H. Cottrell
CAROLYN H. COTTRELL

EXHIBIT A

**TÒA ÁN LIÊN BANG KHU VỰC
ĐẶT TẠI NEBRASKA**

MARIA GUZMAN MORALES và
MAURICIO GUARJARDO, thay mặt cho
họ và tất cả những người trong tình trạng
tương tự,

Đương đơn,
kiện

FARMLAND FOODS, INC., Smithfield
Foods tổng công ty và công ty con tại
Delaware,

Bị đơn.

Số hồ sơ 8:08-cv-504

**LỜI TUYÊN BỐ CỦA
Ông HUỲNH CAI**

Tôi, Huỳnh Cai, xin tuyên bố nơi đây rằng:

1. Tôi trên 18 tuổi và tôi hoàn toàn tự tin để thực hiện lời tuyên bố này.
2. Tôi có kiến thức cá nhân về những dữ kiện nêu trong tuyên bố này, và những dữ kiện trong tuyên bố này là đúng sự thật.
3. Tôi cư ngụ tại Lincoln, Nebraska.
4. Tôi đã trình sự thỏa thuận tham dự vụ kiện trên đây với tư cách người đương đơn tự nguyện.
5. Sự thỏa thuận tham dự vào vụ kiện này của tôi đã được nộp tại tòa này.
6. Tôi không muốn là đương đơn trong vụ kiện này nữa, và tôi xin rút lại sự thỏa thuận tham dự trong vụ kiện.
7. Luật sư của tôi đã cho tôi biết rằng việc rút lại sự thỏa thuận sẽ dẫn đến sự hủy bỏ tất cả những thỉnh cầu của tôi.

Tôi xin thề, dưới hình phạt cho tội khai man theo luật pháp Hoa Kỳ, rằng những lời khai trên đây là đúng sự thật. Được thực hiện vào ngày 16 tháng Ba, 2011, tại Lincoln, Nebraska.


Huỳnh Cai

THÔNG BÁO RÚT ĐƠN KIỆN

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

MARIA GUZMAN MORALES and
MAURICIO GUARJARDO, on behalf of
themselves and all others similarly
situated,

Plaintiffs,

v.

FARMLAND FOODS, INC., a Delaware
Corporation and subsidiary of Smithfield
Foods,

Defendant.

Case No. 8:08-cv-504

**DECLARATION OF
HUYNH CAI**

I, Huynh Cai, hereby declare:

1. I am over 18 years of age and am fully competent to make this declaration.
2. I have personal knowledge of the facts stated in this declaration, and the facts in this declaration are true and correct.
3. I reside in Lincoln, Nebraska.
4. I submitted a consent to join the above captioned lawsuit as an opt-in plaintiff.
5. My consent to join this lawsuit was filed with this Court.
6. I no longer wish to be a plaintiff in this lawsuit, and I would like to withdraw my consent to join this action.
7. My attorneys have advised me that withdrawal of my consent will result in the dismissal of all of my claims.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on ____ of March, 2011 at Lincoln, Nebraska.

Huynh Cai

NOTICE OF WITHDRAWAL